

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

ROBERT WATTERSON, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff,)	Civil Action No. 18-cv-00513
v.)	
)	
CONSUMER REPORTS, INC.,)	
)	
Defendant.)	

**JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO
THE AMENDED COMPLAINT AND STIPULATED BRIEFING SCHEDULE**

Plaintiff Robert Waterson and Defendant Consumer Reports, Inc. jointly move for an extension of time for Defendant to respond to the Amended Complaint to and including January 25, 2019 and for the Court to enter a stipulated briefing schedule on Defendant's anticipated Motion to Dismiss. In support of this Motion, the parties state as follows:

1. On November 30, 2018, Defendant filed a Motion to Dismiss the original Complaint. (Dkt. 12.) According to the briefing schedule previously stipulated to by the parties and entered by this Court on November 11, 2018, Plaintiff's response was due on January 11, 2019. This Court also entered an identical briefing schedule in *Watterson v. Trusted Media Brands, Inc.*, No. 18-cv-00520 ("*TMBF*").

2. Instead of filing a response to Defendant's Motion to Dismiss the original Complaint, Plaintiff elected to file an Amended Complaint on Friday, December 21, 2018. (Dkt. 13.) Plaintiff filed an Amended Complaint in the *TMBI* matter on that same date as well. Pursuant to Rule 15(a)(3), Defendant's current deadline to respond to the Amended Complaints is January 4, 2019.

3. Defendant intends to file a Motion to Dismiss the Amended Complaints. Due to the Christmas and New Year holidays that fell during the period Defendant currently has to

respond to the Amended Complaint, and previously scheduled vacations during that time, Defendant's counsel requires additional time to prepare the Motion to Dismiss.

4. Accordingly, the parties jointly request that the Court enter the following briefing schedule on Defendant's anticipated Motion to Dismiss the Amended Complaint:

- Defendant's Motion to Dismiss Due January 25, 2019
- Plaintiff's Response Due February 15, 2019
- Defendant's Reply Due March 8, 2019

5. Simultaneous with this Motion, the parties are filing a substantially similar motion requesting the same extension and briefing schedule in the *TMBI* matter.

WHEREFORE, the parties respectfully request that the Court grant Defendant an extension of time to and including January 25, 2019 to respond to the Amended Complaint and enter the briefing schedule proposed above.

Dated: January 3, 2019

Respectfully submitted,

Counsel for Plaintiff

Counsel for Defendant Consumer Reports, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO THE AMENDED COMPLAINT AND STIPULATED BRIEFING SCHEDULE was filed through the ECF system this 3rd day of January, 2019, and will be sent via the ECF system to registered participants, including the following:

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